



**Northwest Jefferson County Chamber of Commerce**  
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February 12, 2003

Honorable Michael Powell  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20544

RE: CC Docket No. 01-338, Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers

Dear Chairman Powell;

The Northwest Jefferson County Chamber of Commerce is concerned with the unbundled element platform (UNE-P) as it exists today. While all telecommunications' economic problems cannot be blamed on UNE-P, much of it can be.

A half million high paying jobs have been lost over the past three years within the industry and its suppliers. The few jobs gained in the sector were mostly telemarketers reselling a product already built and maintained by others.

UNE-P does not encourage investment by competitors. It makes no sense to build when one can buy cheap. Nor does UNE-P encourage incumbent telecommunication companies to invest beyond maintenance knowing the investment could be forced to sold at an unreasonable rate.

As a chamber that represents a suburban-rural county we have seen a scaled back deployment of broadband services. This puts the businesses in our county at a technological and economic disadvantage to the more urban businesses already served by broadband services. Our businesses are also harmed not only by the lack of available technology but also by the loss of jobs and the uncertainty of further job losses.

The Northwest Jefferson County Chamber of Commerce asks that the FCC eliminate UNE-P for switching and high capacity transport and loops. Prolific capacity and

inexpensive switching equipment make this requirement unnecessary. Also extending unbundling to broadband should not happen. Incumbent companies will not invest because investors will not invest in them. The job loss will continue along with both an eroding revenue base for our members and a declining tax base for all levels of government.

Please contact me via e-mail at [nwjcounty@sbcglobal.net](mailto:nwjcounty@sbcglobal.net) or by phone at 314-505-0920 if you require additional information or clarification.

Sincerely,

James J Lazzari

President

CC: Commissioner Abernathy  
Commissioner Adelstein  
Commissioner Martin  
Commissioner Copps